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6 **UNITED STATES DISTRICT COURT**  
7 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

8 GROUND GAME LA, a California  
9 nonprofit corporation

10 Plaintiff,

11 v.

12 CERISE CASTLE, an individual;  
13 BENJAMIN CAMACHO, an  
individual; KATJA SCHATTE, an  
individual; MORGAN KEITH, an  
individual; KNOCK LA, a California  
15 nonprofit corporation,

16 Defendants.

Case No. 2:25-cv-03852-MRA-JPR

17 **DECLARATION OF CERISE  
CASTLE IN SUPPORT OF  
DEFENDANT'S SPECIAL MOTION  
TO STRIKE (ANTI-SLAPP)**

18 [Cal. Code Civ. Proc. § 425.16; Fed. R.  
Civ. P. 12(b)(6)]

19 [Filed concurrently with (1)  
Memorandum of Points & Authorities;  
20 (2) Declaration of Almuhtada Smith (3)  
Declaration of Karl Mill (4) Request for  
22 Judicial Notice; and (5) [Proposed]  
Order]

23 Judge: Hon. Mónica Ramírez Almadani

1           **DECLARATION OF CERISE CASTLE IN SUPPORT OF DEFENDANT'S**  
2           **SPECIAL MOTION TO STRIKE (ANTI-SLAPP)**  
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4           I, Cerise Castle, declare:

5           1. I am the defendant in this action and a journalist. I make this declaration from  
6 personal knowledge and could testify competently to these facts.

7           2. The following are my public social media accounts: X (formerly Twitter)  
8 @cerisecastile; Instagram @yourmajestcee; TikTok @yourmajestcee; Bluesky  
9 @cerisecastile; and my website at cerisecastile.me. I authored and published the social-  
10 media posts attached as Exhibits A, B, D, E, and F.  
11 Instagram @yourmajestcee, X @cerisecastile, Bluesky @cerisecastile, and  
12 cerisecastile.me. I authored and published the posts attached as Exhibits A–D.

13           3. Exhibits A, B, D, E, and F are true and correct copies (or print-to-PDF  
14 captures) of posts I made on the dates shown in the exhibit captions. I captured or  
15 reviewed each exhibit to confirm it matches what appeared publicly at the time,  
16 including the visible URL, handle, and date/time stamp. I have not altered the text or  
17 images.

18           4. My posts addressed matters of public concern, including nonprofit governance,  
19 authorship and ownership of journalism published under "Knock LA," donor  
20 transparency, and my experiences working with or around Ground Game LA. My aim  
21 was to inform the public and contributors about those issues.

22           5. None of my posts were advertisements. I did not sell goods or services under  
23 "KNOCK LA," and I did not use "KNOCK LA" as a brand or source identifier in  
24 commerce.

25           6. The statements in my posts were true to the best of my knowledge or  
26 constituted my opinions based on disclosed facts, personal experiences, and documents I  
27 reviewed. I did not publish with knowledge of falsity or serious doubts about the truth

of what I said.

7. In 2024, before this lawsuit was filed, I resigned from the Knock LA nonprofit. I have not participated in its operations during wind-up. In December 2024, any application connected to me to register “KNOCK LA” at the USPTO was abandoned. I have no present or future intent to use or register “KNOCK LA” as a trademark.

8. With respect to Plaintiff’s allegation of a “Confidential List,” I did not obtain, disclose, or use any such list by improper means. While I had access to the Knock Slack workspace, I observed fundraising scripts and donor/prospect spreadsheets being shared broadly in channels accessible to non-employees and volunteers, including invitations for “anyone who wants” to make calls/emails and links to external documents. Exhibit C is a true and correct screenshot from my files of a message by [REDACTED] in that Slack workspace (captured on or about January 17, 2024) that included links to a phone script and a prospect donor list. I am offering Exhibit C to show how broadly the materials were distributed and that links were provided openly, not for the truth of any statements in the message. I have redacted personal information to protect privacy.

I declare under penalty of perjury under the laws of the United States of America  
that the foregoing is true and correct.

Dated: August 29, 2025

/s/ Cerise Castle

Cerise Castle

## Exhibit List

**Exhibit A** – X Post. April 11, 2024. The post announces that Ground Game LA deleted my Knock LA accounts and includes the Open Letter calling allies to support journalism. Exhibit A is true and correct copy of my X post dated April 11, 2024 at 7:13 AM, available at <https://x.com/cerisecastle/status/1778426143109988726>.

**Exhibit B** – X Post. October 31, 2024. The post highlights that known Knock LA journalist did not create the Knock Voter Guide for the 2024 General Election. Exhibit B is true and correct copy of X posted dated October 31, 2024 at 1:37 PM available at <https://x.com/cerisecastle/status/1852087519032029658>.

**Exhibit C** – Slack Post. January 17, 2024. Exhibit C is a true and correct screenshot from my files of a message by [REDACTED] in the Knock Slack workspace stating, in substance, “Here is an updated phone script for anyone who wants to make some fundraising calls/emails … Here is the prospect donor list,” followed by two Google links. I confirm I saw this post while I had access to that workspace. The screenshot reflects broad distribution to participants, including non-employees and volunteers. I have redacted Exhibit C to protect personal information.

**Exhibit D** – X Post. October 31, 2024. Exhibit D is a true and correct screenshot of my X post dated October 31, 2024 at 3:13 PM, which states that “@GroundGameLA has threatened to sue me for speaking out. @GroundGameLA is still displaying and profiting from my work on their website, ignoring takedown notices from my attorneys,” and is available at <https://x.com/cerisecastle/status/1852111675312206306>,

**Exhibit E** – X Post. June 10, 2024. Exhibit F is a true and correct screenshot of my X post dated June 10, 2024 at 5:29 PM from my files, which states that “regular

1 contributors are no longer affiliated with knock-la.com (and @GroundGameLA is  
2 refusing to take down our work, despite law dictating that they must).”  
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